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Friday, June 20, 2003

Ms. Marlene Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Room TW-B204
Washington, DC 20554

Dear Ms. Dortch:

I would very much like to comment on Broadband Over Power Lines (BPL), under consideration by the FCC.

For the past 20 years I have been an amateur radio operator. It is a hobby that I have enjoyed very much, but it also provides an opportunity to be of service, and many if not most of our over 600,000 amateur licensees have taken advantage of the opportunity to be of service to our communities, states and country.

When I lived in the Midwest, I participated as an amateur in tornado watch "Sky Warn" activities, and have provided service in various other settings, including local parades, etc. I participate weekly in national radio "nets" where amateurs communicate with each other and learn the skills needed to handle emergency traffic should the occasion arise.

As the Commission is undoubtedly aware, amateur radio operators were among the first responders during the events of 9-11-01, providing communications service in NYC, Pennsylvania, and Washington, DC. We are very proud of the service provided by these amateurs in a time of serious national emergency.

I truly believe that Amateur Radio is a valuable service and a valuable resource that must be protected.

Following extensive reading, I have come to believe that Broadband over Power Line transmissions pose a huge threat to all users of the HF and low VHF radio spectrum, whether military, commercial, medical or amateur. The present FCC Part 15 limits for this technology already can result in substantial interference potential to amateur frequencies. I am convinced that BPL systems radiating widely through the spectrum,

and occupying entire neighborhoods will have far greater interference potential than localized systems, such as switching power supplies or electric motors.

I understand that there have been BPL field trials, but that no field trials have studied immunity. How will deployment affect amateurs and other licensed users of the spectrum operating their stations in areas where BPL is deployed? Will they be immune from harmful interference caused by BPL? I am convinced otherwise.

I understand that the American Radio Relay League, (ARRL) recently petitioned the FCC for an amateur LF allocation in the vicinity of 136 kHz. The electric utility industry claimed in comments on the ARRL's petition that its PLC devices--operating on an unlicensed basis on frequencies below 490 kHz--would suffer harmful interference from 1 W effective isotropically radiated power (EIRP) amateur stations. The FCC agreed and chose not to grant Amateur Radio the LF allocation it sought. If this logic holds, how can the utility industry claim that on HF and low-VHF--frequencies where power lines make better antennas than they do on LF--BPL signals can coexist with amateur stations that may be running more than 10,000 W EIRP?

The FCC is charged with and has promised to protect licensed users of the spectrum. The commission has upheld that charge. Please continue with that course and do not allow deployment / implementation of BPL without study, and without determining that licensed users of HF and low VHF frequencies will remain immune from harmful interference, so that amateur radio operators can practice our hobby which we enjoy, but more importantly, so that we can continue to be of service.

Thank you for your consideration,

Carl Heidenblad, N1CUU